

CITY OF SPRINGFIELD
INTER-OFFICE MEMORANDUM

ATTENTION OF FILE

DATE 12-21-87

DEPARTMENT _____

RE: C.A.T.T. - Disposal of Parts Washing Solution

Karen Chandler and I met with Mr. Gene Bungarner, with C.A.T.T. (2525 E. Kearney), on Monday, Nov. 16,, 1987 at 9:00 A.M. to discuss the proper disposal of the spent parts washing solution in his parts washer. He uses the parts washer to clean transmission housings & transfer cases. The washer has a reservoir under it that holds approximately 56 gallons. (3.0' x 2.5' x 1.0' = 7.5 cu. ft., 7.5 x 7.48 = 56.1 gallons). The solution is recycled until it becomes too dirty to use. At this point it is replaced with new. Mr. Bungarner's problem is that he is now ready to change out the solution for the first time and he wants to know what the proper disposal method is. The spent solution has a pH of 13.0+ and appears to be very high in Oil & Grease. We also expect a lot of solids to settle out. We told Mr. Bungarner that before he could dump the solution into the sanitary sewer that he would have to prove to the City that it meets discharge limits as outlined in Chapter 30 - Northwest Wastewater Treatment Plant limits by means of sample results. He also wanted to know what to do with the oil that he removes from the solution.

We told Mr. Bungarner that we would do some checking to see if we could help him on his disposal problem. Mr. Chuck Kroeger, M.D.N.R., said that if the solution is pumped from the parts cleaning into a 55 gallon drum, until proper disposal can be accomplished, that C.A.T.T. would be in violation of Mo. Hazardous Waste Laws because of a pH over 12.5 & by an accumulation of over 220# in a month.

On November 17, 1987 Judy Gravitt, C.A.T.T. partners wife, called and said they had an oil & grease sample run and the results were over the City's 100 mg/l limit. She also wanted to know about pumping the reservoir of the parts washer out to a drum until they can determine the proper method of disposal. I told her that she would need to contact Mr. Chuck Kroeger, M.D.N.R., since he would be the one to enforce the Missouri Hazardous Waste Laws.

On November 18, 1987 I received a call from Mr. Donald Vassar, Ecology & Environmental Systems, Inc., stating that C.A.T.T. wanted him to do the analytical work on the solution in their parts cleaner. He was wanting to know if we wanted total metals run on the parameters that are listed for the Northwest Treatment Plant. We told him to run total metals. Mr. Vassar was also wanting to know where C.A.T.T. had obtained a copy of the Northwest Treatment Plant limits. I informed him that they were in our Wastewater Regulations, Chapter 30 of the Springfield City Code. I told him that we would drop by his lab and give him a copy of Chapter 30 if he wanted it. He indicated he did. We stopped by his lab later that day.

Judy Gravitt called on December 1, 1987 with sample results. They were as follows:

pH	13.46
O & G	1617 mg/L
Cd	.01 mg/L
Cr	1.3 mg/L
Cu	2.4 mg/L
Pb	2.5 mg/L
Ni	2.6 mg/L
Zn	9.1 mg/L

SIGNED _____

2525 E. KEARNEY

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She told me that the solution was still in their parts cleaning machine, and they had not transferred it to a drum. She indicated that if we would not take the material to the sanitary sewer, they would have Sunbelt Environmental dispose of it. I told her that we would not accept the material in the sewer. She said that she needed a Generator's Number if Sunbelt disposed of it and wanted to know about obtaining a number. I referred her to the Missouri Department of Natural Resources.

She wanted to know if she could dilute the material and put it in the sewer as Ecology & Environmental Systems, Inc. had indicated to her. I explained that we could not accept that method either because we would still be receiving the same number of lbs. of metals even though there was more liquid volume.

She also wanted to know if in the future she could evaporate off the liquid and then place the remaining residue in their dumpster to be taken to the landfill. I referred her to Henry Cole, Sanitary Engineer for the City of Springfield. Henry told me that he would probably tell her that the residue could not be taken at the landfill because of the high concentration of metals.

SIGNED _____

Gene Pabst

Gene Pabst

2525 E. Kearney

JOHN ASHCROFT
Governor

FREDERICK A. BRUNNER
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

Springfield Regional Office
1155 East Cherokee Street
Springfield, MO 65807
417-883-4033

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

Greene County/WMP
General

NOV 3 1987

Judy Gravitt

November 2, 1987

C.A.T.T.
2525 East Kearney
Springfield, MO 65803

Attention: Mr. Gene Bumgarner

Dear Mr. Bumgarner:

This is to confirm our conversation of October 27, 1987 regarding waste oil and spent caustic cleaner generated at the C.A.T.T. facility in Springfield, Missouri.

At the time of my inspection there were several five gallon containers of waste oil stored in a back room and one 55-gallon drum with waste oil in it. The total amount accumulated appeared to exceed the regulated amount (100 kg.) as defined in 10 CSR 25-11.010 (copy enclosed). This requires registration as a generator and proper handling of the material.

A registration form for waste oil generators is enclosed. Also enclosed is a form for resource recovery certification and the applicable regulations. You had indicated a possible interest in utilizing a waste oil burner for heating your shop. Resource Recovery Certification would be required if you proceed with such.

The spent caustic cleaner must also be properly handled and disposed of. If the pH is below 12.5 it is not a hazardous waste but it must not be disposed of by dumping it on the ground. It was suggested that you contact the Springfield Sanitary Services Department for guidance in possibly discharging the liquid portion to the municipal sewerage system.

Within 15 days of the date of this letter you should submit a completed application for a waste oil generators number. You must also by that date containerize the waste oil which you have on hand.

2525 E. Kearney

Your cooperation in this matter will be appreciated. If you have any questions regarding these matters, do not hesitate to contact me.

Sincerely,

SPRINGFIELD REGIONAL OFFICE



Charles L. Kroeger
Environmental Specialist

CLK/cg

cc: ~~Mr.~~ Gene Pabst, Springfield Sanitary Services